

Exhibit 2

IN THE UNITED STATES DISTRICT COURT

11:25:00

FOR THE EASTERN DISTRICT OF VIRGINIA

NORTHSTAR AVIATION, LLC, :

et al., :

Plaintiffs, :

vs. : Civil Action No.

ALDEN BURT ALBERTO, : 1:18cv191-TSE-JFA

et al, :

Defendants. :

Videotaped Deposition of

NRASIB ALI TAHIR

McLean, Virginia

Thursday, October 18, 2018

11:25 a.m.

Reported by: Donna A. Peterson

1 Q. Did he provide any money to Vulcan? 12:04:03

2 A. I can't answer, it's quite general. 12:04:06

3 Q. Okay. Sitting here today, can you point 12:04:07

4 to any funds that you are aware of the sheikh 12:04:10

5 directly contributing to Vulcan Management? 12:04:12

6 A. Directly? No, I can't recall any 12:04:14

7 transaction like that. 12:04:17

8 Q. Okay. Who would you attribute to funding 12:04:18

9 Vulcan Management? 12:04:30

10 A. Reflex Responses. 12:04:31

11 Q. Through Mr. Alberto, correct? 12:04:38

12 A. Mr. Alberto being CEO there. 12:04:40

13 Q. Why did Mr. Alberto decide to send the 12:04:44

14 money to Vulcan? 12:04:47

15 MR. BENNETT: Objection to form. 12:04:49

16 THE WITNESS: I wouldn't know that. 12:04:50

17 BY MR. JOHNSON: 12:04:59

18 Q. Other than the funds that came over from 12:05:05

19 R2, are you aware of any other contributions, 12:05:06

20 monetary contributions, going to Vulcan Management? 12:05:11

21 A. No. 12:05:15

22 MR. JOHNSON: Okay. I'd like to hand you 12:05:18

1 provided to the sheikh? 14:40:28

2 A. As I mentioned earlier, anything which 14:40:31

3 needed to be handed over to sheikh would go through 14:40:34

4 Mr. Salem. So I would give it to him and I assume 14:40:37

5 like it was delivered. 14:40:41

6 Q. Right. But are you aware of a time where 14:40:42

7 the sheikh made a request and that request was 14:40:44

8 never -- was not honored? 14:40:46

9 A. I would not recall any -- any event like 14:40:48

10 that. 14:40:53

11 Q. Okay. Let's look at the cash forecast in 14:40:53

12 Exhibit 8. 14:41:01

13 You prepared this forecast, right? 14:41:02

14 A. Yes. 14:41:04

15 Q. And it lays out a number of different 14:41:05

16 scenarios that are reflected in blue, right? 14:41:07

17 A. Correct. 14:41:10

18 Q. Why were you laying out different 14:41:12

19 scenarios? 14:41:14

20 A. As far as I remember correctly, I guess 14:41:16

21 so -- this was when the contract ended and there was 14:41:21

22 no other business with NorthStar. So the only thing 14:41:26

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1 was going on was business development and proposals 14:41:31
2 out. So no contracts, no revenue coming in to the 14:41:35
3 company. So at that time, Reno and I had discussion 14:41:38
4 and quite a few times actually over this thing. So 14:41:41
5 we needed to reduce our overheads. So there were 14:41:44
6 different scenarios, so in how much cost-cutting 14:41:48
7 would lead us to 2019 to end up the warranty period. 14:41:52
8 So these numbers are actually based on that. 14:41:56

9 Q. Okay. And so what were you contemplating? 14:41:59
10 What costs were you specifically contemplating as 14:42:05
11 part of this cost reduction? 14:42:07

12 A. Yeah, as the scenarios changes, it's 14:42:09
13 different. So current, when you go in the right 14:42:11
14 number, it shows like we'll be cash negative in a 14:42:13
15 certain period, and that's all the different 14:42:17
16 scenarios are. So if we go with 50 percent cost 14:42:21
17 reduction, it's different 60 and 65. 14:42:24

18 Q. Okay. And as part of this cost reduction, 14:42:27
19 were you contemplating laying off employees? 14:42:32

20 A. Yeah, letting go employees was one of the 14:42:34
21 things. 14:42:36

22 Q. Okay. What were some of the other things 14:42:36

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1 comfortable from a liquidity standpoint prior to 14:54:48

2 October 2017? 14:54:51

3 **A. No, I don't recall that.** 14:54:52

4 Q. Okay. Reno paid himself bonuses, too, 14:54:53

5 correct? 14:55:10

6 **A. Correct.** 14:55:10

7 Q. Prior to October 2017, did you ever think 14:55:11

8 any of Reno's bonuses were inappropriate? 14:55:20

9 **A. I wasn't in that position to judge Reno's** 14:55:22
10 **bonuses.** 14:55:25

11 Q. Well, as it relates to the liquidity of 14:55:26

12 the company, did you -- 14:55:28

13 **A. Liquidity, no. As I said, I never felt** 14:55:29
14 **uncomfortable as far as the liquidity of the company** 14:55:32
15 **was concerned.** 14:55:35

16 Q. And you may have said this earlier and I 14:55:35

17 apologize if I did ask it earlier and I apologize for 14:55:37

18 asking it again, but since Reno left the company in 14:55:40

19 October 2017, have you personally received a bonus? 14:55:45

20 **A. No. No one received a bonus after that.** 14:55:47

21 Q. Are you expecting a bonus at the end of 14:55:51

22 this year? 14:55:53

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Donna A. Peterson, the officer before
3 whom the foregoing proceedings were taken, do hereby
4 certify that the foregoing transcript is a true and
5 correct record of the proceedings; that said
6 proceedings were taken by me stenographically and
7 therefore reduced to typewriting under my
8 supervision; and that I am neither counsel for,
9 related to nor employed by any of the parties to this
10 case and have no interest, financial or otherwise, in
11 its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my
13 hand and affixed my notarial seal this ____ day of
14 _____, ____.

15

16 My commission expires: June 30, 2020

17 Reg. #7231839

18

19 _____

20 NOTARY PUBLIC IN AND FOR THE

21 COMMONWEALTH OF VIRGINIA

22